IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

LINDA FAIRSTEIN,	)	
	)	
Plaintiff,	)	Case No: 2:20-cv-00180-FtM-66MRM
	)	
v.	)	
	)	
NETFLIX, INC., AVA DUVERNAY,	)	
and ATTICA LOCKE,	)	
	)	
	)	
Defendants.	)	

DECLARATION OF LANCE R. RIBACOFF

I, Lance R. Ribacoff, declare as follows:

1.   I am an employee of International Investigative Group, Ltd., a New York State licensed private investigative agency. Our firm was retained by Nesenoff & Miltenberg LLP to conduct a variety of social media archival work, including as related to social media accounts for Ava DuVernay and Attica Locke.

2.   Specifically, our firm was tasked with ascertaining: a) how many of Ava DuVernay's Twitter followers are located in the State of Florida; and b) how many of Attica Locke's Twitter followers are located in the State of Florida. If any Florida followers were found for either account, I was asked to determine how many of them "liked" the tweets cited at Paragraphs 153, 162, 163, 173, 175-177, 183, 191, 194, 195 and 197 of the Complaint filed in this action. I have attached to this declaration as Exhibit 1 a copy of the Complaint.

3.   On April 2, 2020, utilizing a website called FollowersAnalysis.com, a Comma-Separated Values file was produced containing the following information for the 2.38 million Twitter users who followed Ms. DuVernay, or @ava:

1. User Id
2. Name
3. Username
4. Twitter Joined Date
5. Verified or Non-Verified
6. Bio
7. Location

This CSV file was then analyzed to extract the followers who indicated in their "Location" field

that they are from Florida. Our filter parameters included, but were not limited to:

1. "Florida"
2. ", FL"   example: "Miami, *FL*"
3. ",FL"   example: "Miami,*FL*"
4. Containing the word Florida anywhere in the text field
5. Miami
6. Fort Lauderdale
      a.   Other spelling varieties (Ft. Lauderdale, Ft Lauderdale)
7. Orlando
8. Boynton Beach
9. Jacksonville
10. Duval County
11. Boca Raton
12. Daytona Beach
13. Coral Gables
14. Tampa Bay
15. Tampa
16. West Palm Beach

In total, 24,352 unique users were located. I have attached to this declaration as Exhibit 2 a true

and correct copy of the data resulting from these searches.

4.   On April 8, 2020, utilizing a website called FollowersAnalysis.com, a Comma-

Separated Values file was produced containing the following information for the 15,910 Twitter

users who follow @atticalocke:

1. User Id
2. Name
3. Username
4. Twitter Joined Date
5. Verified or Non-Verified
6. Bio

7. Location

This CSV file was then analyzed to extract the followers who indicated in their "Location" field

that they are from Florida. Our filter parameters included, but were not limited to:

1. "Florida"
2. ", FL"   *example: "Miami, **FL**"*
3. ",FL"   *example: "Miami,**FL**"*
4. Containing the word Florida anywhere in the text field
5. Miami
6. Fort Lauderdale
    a. Other spelling varieties (Ft. Lauderdale, Ft Lauderdale)
7. Orlando
8. Boyton Beach
9. Jacksonville
10. Duval County
11. Boca Raton
12. Daytona Beach
13. Coral Gables
14. Tampa Bay
15. Tampa
16. West Palm Beach

In total, 238 unique users were located. I have attached hereto as Exhibit 3 a true and correct

copy of the data resulting from these searches.

5.   On May 8, 2020, the tweets cited at Paragraphs 153, 162, 163, 173, 175-177, 183,

191, 194, 195 and 197 were analyzed for the specific purpose of quantifying how many

individuals who liked each tweet indicated they were located in Florida. Notably, for a majority

of the tweets from Ms. DuVernay (cited at Paragraphs 173, 175-177, 178 and 183 of the

Complaint), we were limited to observing the details for only a small portion of the users who

actually "liked" each tweet. This is because Twitter limits the amount of displayed profiles who

liked a specific tweet in comparison to the actual number of actual likes. For example, if a tweet

contained 1,200 likes, we could only see the names and Twitter profiles of approximately 60 of

them.

6. Attached hereto as Exhibit 4 are the results of this investigation. A majority of Ms. DuVernay's selected tweets were liked by at least one Florida user despite the extremely limited sample size. A majority of Ms. Locke's selected tweets were also liked by at least one Florida user.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

 Executed on the 24th day of June 2020.

Lance R. Ribacoff